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March 15, 2022

Granted. There shall be no further extension of the April 1 date.

3/15/2022

VIA ECF

Hon. Denise Cote, U.S.D.J.
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007



DENISE COTE
United States District Judge

Re: *Neuman v. Global Security Solutions, Inc., et al.*, Case No. 1:21-cv-01670-DLC

Dear Judge Cote:

I represent Plaintiff Phil Neuman, who intends to file a motion for summary judgment on liability. Pursuant to paragraph 1.E of your Individual Practices, Mr. Neuman requests a two-week extension of the current deadline for filing summary judgment motions, March 18, 2022:

- (1) The original deadline is March 18, 2022. *See* Pre-Trial Scheduling Order [22] at ¶ 5.¹
- (2) No previous requests have been made to extend this deadline.
- (3) This is therefore the first such request the Court will consider.
- (4) Defendants Global Security Solutions and Werner Hellmann consent to this request.

This request is necessary because I have been struggling with the painful medical condition of kidney stones since January 31, 2022. I was nevertheless able to complete party depositions on February 23, 2022. Laser surgery was successfully performed on March 8, 2022, but I was still recovering and did not return to work until this week.

¹ Before you were assigned to this case, a prior order directed the parties to send a joint letter by February 14, 2022 informing the Court as to whether any party intended to file a dispositive motion. *See* August 3, 2021 Case Management Plan and Scheduling Order [18] at ¶ 11. That Order, which did not set a deadline for summary judgment motions, was superseded by your November 9, 2021 Pre-Trial Scheduling Order [22] at p. 1 (“the following schedule shall govern further conduct of pretrial proceedings in this case.”).

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This short extension will not affect any other scheduled dates except the remainder of the summary judgment briefing schedule. Accordingly, Mr. Neuman requests that the entire briefing schedule be extended by two weeks as follows:

	<u>Original Due Date</u>	<u>Extended Due Date</u>
Motion due:	March 18, 2022	April 1, 2022
Opposition due:	April 8, 2022	April 22, 2022
Reply due	April 22, 2022	May 6, 2022

Thank you for considering this request.

Sincerely,

/s/ Edward Griffith

Edward Griffith

EG:gb
cc: Terrence Worms, Esq.